

The request is GRANTED. Pretrial Motions shall be filed no later than **August 7, 2023**. The Government's response shall be filed no later than **August 21, 2023** and Defendants' replies shall be filed no later than **August 28, 2023**. Due to an unavoidable conflict for the Court from December 4-8, 2023, the jury trial previously scheduled to begin on November 27, 2023 shall be held on **October 23, 2023 at 9:00AM**. The Court will reschedule the Final Pre-Trial conference and will issue a new pre-trial schedule shortly.

WL | Wright Law
ATTORNEY AT LAW

Dated: July 24, 2023
New York, New York

SO ORDERED


JENNIFER L. ROCHON
United States District Judge

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July 22, 2023

VIA ECF

The Honorable Jennifer L. Rochon
United States District Judge Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Bevelyn Williams, et al 22 Cr. 91 (RA)*

Dear Judge Rochon:

I represent Bevelyn Williams in the above referenced Indictment and write jointly on behalf of both of the defendants and with the gracious consent of the government, through AUSA Jamie Bagliebter, to request that the Court's motion schedule be extended. Trial in this case is scheduled for November 27, 2023, and substantive motions are due by July 24, 2023. See ECF # 32. For the reasons set forth below we respectfully request that substantive motions be filed on or before August 7, 2023; the government response filed by August 21, 2023; and defendants reply filed by August 28, 2023.

[REDACTED]

[REDACTED] I will alert the court that our substantive motion are in line with other constitutional challenges to the Freedom of Access to Clinic Entrances Act.

All defendants further consent to the exclusion of time pursuant to the Speedy Trial Act.

Sincerely,
/s/
Christopher Wright